

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

WORCESTER, ss.

In re:

WESTBOROUGH SPE LLC,

Debtor.

Chapter 7

Case No. 23-40709-CJP

NOTICE OF ISSUANCE OF SUBPOENAS

Pursuant to Rule 45(a)(4) of the Federal Rules of Civil Procedure, made applicable to bankruptcy cases by Rule 9016 of the Federal Rules of Bankruptcy Procedure, notice is hereby given that subpoenas have been issued and served upon the following individuals and entities:

1. David Abromowitz of Goulston & Storrs PC
2. Ferris Development Group, LLC
3. Jonathan Goldsmith, The Chapter 7 Trustee
4. Lax Media LLC
5. The Town of Westborough

Copies of the subpoenas are attached to this notice and have been served on all parties involved in this case prior to serving the subpoenas on the recipients listed above.

DATED: August 19, 2024, Respectfully submitted:

By creditor,



Lolonyon Akouete
800 Red Milles Rd
Wallkill NY 12589
info@smartinvestorsllc.com
(443) 447-3276

UNITED STATES BANKRUPTCY COURT

District of MASSACHUSETTS

In re WESTBOROUGH SPE LLC
Debtor

(Complete if issued in an adversary proceeding)

Case No. 23-40709-CJP

Chapter 7

Plaintiff

v.

Adv. Proc. No.

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Gary M. Ronan and David M. Abromowitz of Goulston & Storrs PC.

(Name of person to whom the subpoena is directed)

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: The request seeks information from Gary M. Ronan and David M. Abromowitz of Goulston & Storrs PC about the beneficial owners of Westborough SPE LLC, including details on Mignonette Investments Limited, Abraxas International, and their connections with the TMF Group, as well as information on the original clients who engaged their services for the formation of Westborough SPE LLC.

PLACE

800 Red Milles Rd Wallkill NY 12589 Attn:Lolonyon Akouete

DATE AND TIME

September 3, 2024 at 10:00 AM

☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

PLACE

DATE AND TIME

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 8/19/24

CLERK OF COURT


Signature of Clerk or Deputy Clerk

OR

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party), who issues or requests this subpoena, are:

Lolonyon Akouete 800 Red Milles Rd Wallkill NY 12589 info@smartinvestorsllc.com (443) 447-3276

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES BANKRUPTCY COURT

District of MASSACHUSETTS

In re WESTBOROUGH SPE LLC
Debtor

(Complete if issued in an adversary proceeding)

Case No. 23-40709-CJP

Chapter 7

Plaintiff

v.

Adv. Proc. No.

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: From Ferris Development Group, LLC

(Name of person to whom the subpoena is directed)

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All documentation and correspondence related to Lax Media LLC's bid, including communications with the Trustee or the Town about the sale, any agreements regarding potential compensation if the sale with Ferris Development Group does not proceed, and all communications with Scott A. Schlager and Stephen Gordon related to the filing of this bankruptcy.

PLACE

800 Red Milles Rd Wallkill NY 12589 Attn:Lolonyon Akouete

DATE AND TIME

September 3, 2024 at 10:00 AM

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Date: 8/19/24

CLERK OF COURT

OR


Signature of Clerk or Deputy Clerk

Attorney's signature

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UNITED STATES BANKRUPTCY COURT

District of MASSACHUSETTS

In re WESTBOROUGH SPE LLC
Debtor

(Complete if issued in an adversary proceeding)

Case No. 23-40709-CJP

Chapter 7

Plaintiff

v.

Adv. Proc. No.

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Jonathan Goldsmith, The Chapter 7 Trustee

(Name of person to whom the subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All communications and documents related to the settlement, including those concerning offers, bids, property valuations, the rationale for Lax Media LLC's 120-day exclusivity period, market testing and outreach efforts, the analysis of creditor claims, and the dismissal of state court actions.

PLACE

800 Red Milles Rd Wallkill NY 12589 Attn:Lolonyon Akouete

DATE AND TIME

September 3, 2024 at 10:00 AM

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UNITED STATES BANKRUPTCY COURT

District of MASSACHUSETTS

In re WESTBOROUGH SPE LLC
Debtor

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Case No. 23-40709-CJP

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Plaintiff

v.

Adv. Proc. No.

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Lax Media LLC and Lax Media MA LLC

(Name of person to whom the subpoena is directed)

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: The request seeks all communications and agreements between Lax Media LLC, the Trustee, and the Town concerning the exclusivity period, their offer, and the terms related to the property purchase.

| PLACE | DATE AND TIME |
|---|-------------------------------|
| 800 Red Milles Rd Wallkill NY 12589 Attn:Lolonyon Akouete | September 3, 2024 at 10:00 AM |

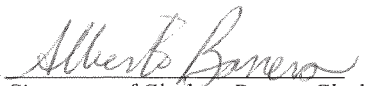
☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

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To: The Town of Westborough

(Name of person to whom the subpoena is directed)

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Documentation of all offers and bids for the property at 231 Turnpike Road, including related communications, appraisals. All correspondence between the Town and the Trustee regarding the sale, settlement negotiations, and buyer selection, as well as documents related to the tax foreclosure process, including communications with Dyann Blaine, Peter Blaustein and Harpreet K. Nakhwal.

PLACE

800 Red Milles Rd Wallkill NY 12589 Attn:Lolonyon Akouete

DATE AND TIME

September 3, 2024 at 10:00 AM

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Attorney's signature

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CERTIFICATE OF SERVICE

I, Lolonyon Akouete, hereby certify that the above document is served by email and mailing a copy of the same, first-class mail, to the following:

Stephen F. Gordon, Attorney of the Petitioners
(Email: sgordon@gordonfirm.com)
The Gordon Law Firm LLP
River Place 57 River Street Wellesley, MA 02481

Scott A. Schlager on behalf of,
Nathanson & Goldberg, P.C., a creditor.
(Email: sas@natgolaw.com)
183 State Street, 5th Floor Boston, MA 02109

Assistant U.S. Trustee
Richard King
Office of US. Trustee
446 Main Street 14th Floor
Worcester, MA 01608
USTPRegion01.WO.ECF@USDOJ.GOV

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Chapter 7 Trustee
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Lolonyon Y Akouete